**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,	)	
	)	No. 18 C 3029
Plaintiff,	)	
	)	Hon. John Z. Lee,
v.	)	District Judge
	)	
REYNALDO GUEVARA, *et al.,*	)	Hon. M. David Weisman,
	)	Magistrate Judge
Defendants.	)	

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's order (Dkt. 380), the parties submit the following joint status report:

A. Current Deadlines/ Magistrate Referral

1.   The deadline for fact discovery in this case is set for August 19, 2022. Plaintiff's expert disclosures are due September 16, 2022. The Magistrate Judge ordered that the parties submit a joint status report by August 22, 2022, as to the proposed scheduling of expert disclosures, incorporating Plaintiff's disclosure date of September 16 as the beginning of that process.

B. Progress of Discovery

2.   Discovery is ongoing in this case. Since the parties last appeared for a status hearing in this case, the parties have continued to engage in written and oral discovery.

3.   Since the last status, the parties have scheduled and completed several depositions.

4. The parties have repeatedly attempted to schedule the deposition of Defendant Anthony Wojcik. Judge Weisman recently ordered Defendant Wojcik to sit for his deposition by August 18. (Dkt. # 393).

5. Regarding the deposition of third-party witness Alberto Rodriguez, the parties are still coordinating with Forest City Low FCI, where Mr. Rodriguez is an inmate, and with Mr. Rodriguez's counsel. Defendants moved the Court to compel Rodriguez to testify at a deposition because they believed he had no basis for invoking the Fifth Amendment. (Dkt. # 370). Magistrate Judge Weisman denied the motion without prejudice and instructed Defendants to file the underlying motion in the appropriate federal court in Arkansas, if they deem fit. (Dkt. # 395). Plaintiff has requested that Defendants please let Plaintiff know by the close of business Monday (7/25) whether defendants intend to engage in motion practice on the issue in Arkansas, so that the parties can resolve the issue of Mr. Rodriguez's testimony in a timely fashion before the conclusion of fact discovery

6. The parties have scheduled two additional third-party depositions.

7. The parties have agreed to mutually remove several previously disclosed witnesses.

C. Pending Motions

8. There are no current motions pending before the Court.

D. Settlement Discussions

9. The parties have not engaged in settlement discussions at this time.

E. Telephonic Hearing

10.   The parties do not seek a telephonic status hearing at this time.

Dated: July 22, 2022

Respectfully submitted,

/s/ Sean Starr

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CERTIFICATE OF SERVICE

I, Sean Starr, an attorney, hereby certify that on July 22, 2022 I caused the foregoing Joint Status Report to be filed using the Court's CM/ECF system, thereby effectuating service on all counsel of record.

/s/ Sean Starr
Attorney for Plaintiff